

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

FEIN, SUCH, KAHN & SHEPARD, P.C.

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JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION
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In Re:

DENISE M HAFELE

Debtor(s).

Case No.: 19-19819 JNP

Adv. No.:

Chapter: 7

Hearing Date: July 23, 2019

Judge: Hon. Jerrold N. Poslusny,
Jr.

**NOTICE OF MOTION TO VACATE
AUTOMATIC STAY PURSUANT TO 11
U.S.C. 362 (d)**

TO: STEPHANIE F. RITIGSTEIN
JENKINS AND CLAYMAN
412 WHITE HORSE PIKE
AUDUBON, NJ 08106
Debtor(s)' Attorney

THOMAS J SUBRANNI
SUBRANNI ZAUBER
1624 PACIFIC AVENUE
ATLANTIC CITY, NJ 08401
Trustee in Bankruptcy

DENISE M HAFELE
10401 CORINTHIAN DRIVE
STONE HARBOR, NJ 08247
Debtor(s)

SIR and MADAM:

PLEASE TAKE NOTICE that the undersigned attorney for the Secured Creditor, JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, shall move before the, United States Bankruptcy Judge, Hon. Jerrold N. Poslusny, Jr., 400 Cooper St, 4th Floor, Courtroom 4C Camden, NJ 08101 on the 23rd day of July, 2019, at 10:00 a.m., or as soon thereafter as counsel may be heard, for the following relief:

A. For an Order to Vacate the Automatic Stay pursuant to 11 U.S.C. 362 (d) (1) and/or (2) to permit JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, to proceed against the Debtor(s) and to foreclose upon residential real property of the Debtor(s) known as 10401 CORINTHIAN DR, STONE HARBOR, NJ 08247-1232 (hereinafter "Premises"), by any lawful means in the Superior Court of New Jersey, Chancery Division; and

B. For such other relief as is just.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, counsel will rely upon the Affidavit of JPMORGAN CHASE BANK, NATIONAL ASSOCIATION.

Dated: 07/02/2019

FEIN, SUCH, KAHN & SHEPARD, P.C.
Attorneys for Secured Creditor,
JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION

/s/ R.A. Lebron, Esq.
R.A. LEBRON, ESQ.